

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<p>IN RE: Heather A. Halldin</p> <p style="text-align: right;">Debtor(s)</p> <p>Wilmington Trust, National Association not in its individual capacity but solely as Owner Trustee of OSAT Trust 2019-2</p> <p style="text-align: right;">Movant</p> <p style="text-align: center;">vs.</p> <p>Heather A. Halldin</p> <p style="text-align: right;">Debtor(s)</p> <p>Per Halldin</p> <p style="text-align: right;">Co-Debtor</p> <p>William C. Miller Esq.</p> <p style="text-align: right;">Trustee</p>	<p style="text-align: center;">CHAPTER 13</p>   <p style="text-align: center;">NO. 21-10176 AMC</p>     <p style="text-align: center;">11 U.S.C. Section 362 and 1301</p>
---	---

**MOTION OF WILMINGTON TRUST, NATIONAL ASSOCIATION NOT IN ITS  
INDIVIDUAL CAPACITY BUT SOLELY AS OWNER TRUSTEE OF OSAT  
TRUST 2019-2  
FOR RELIEF FROM THE AUTOMATIC STAY  
UNDER SECTION 362 AND 1301**

1. Movant is Wilmington Trust, National Association not in its individual capacity but solely as Owner Trustee of OSAT Trust 2019-2.

2. Debtor(s) and Co-Debtor Per Halldin , are the owner(s) of the premises 13S Trooper Rd, Norristown, PA 19403, hereinafter referred to as the mortgaged premises.

3. Movant is the holder of a mortgage, original principal amount of \$172,000.00 on the mortgaged premises that was executed by the Debtor, Heather A. Halldin and Co-Debtor, Per Halldin as co-mortgagors on July 26, 2004 . The mortgage has been assigned as follows:

DLJ Mortgage Capital, Inc to Wilmington Trust, National Association not in its individual capacity but solely as Owner Trustee of OSAT Trust 2019-2 dated 03/16/2021; recording is pending with county.

4. William C. Miller Esq., is the Trustee appointed by the Court.

5. Co-Debtor, Per Halldin, who has not filed for Bankruptcy in this case, is liable on the mortgage loan secured by the aforesaid mortgage together with the Debtor, Heather A. Halldin.

6. Select Portfolio Servicing, Inc. services the loan on the property referenced in this Motion for Relief. In the event the automatic stay in this case is lifted/set aside, this case dismisses, and/or the debtor obtains a discharge and a foreclosure action is commenced on the mortgaged property, the foreclosure will be conducted in the name of Wilmington Trust, National Association not in its individual capacity but solely as Owner Trustee of OSAT Trust 2019-2 . Said entity has the right to foreclose by virtue of being the owner and holder of the note. The promissory note is either made payable to said entity or has been duly endorsed.

7. The commencement and/or continuation of the mortgage foreclosure proceedings by reason of non-payment of monthly mortgage payments were stayed by the filing of a Chapter 13 Petition in Bankruptcy by the Debtor(s).

8. As of April 15, 2021, the total payoff on the mortgage is \$188,253.01.

9. Debtor(s) and Co-Debtor has failed to make the monthly post-petition mortgage payments in the amount of \$1,612.19 for the months of February 2021 through April 2021 as of April 15, 2021.

10. The total amount necessary to reinstate the loan post-petition is **\$4,836.57** as of April 15, 2021

11. Movant is entitled to relief from stay for cause.

12. This motion and the averments contained therein do not constitute a waiver by Movant of its right to seek reimbursement of any amounts not included in this motion, including fees and costs, due under the terms of the mortgage and applicable law.

WHEREFORE, Movant prays that an Order be entered modifying the Stay and permitting Movant to proceed with its mortgage foreclosure on the mortgaged premises, and to allow the Sheriff's Grantee to take any legal action to enforce its right to possession of the mortgage premises. Further, Movant prays that an Order be entered awarding Movant the costs of this suit, reasonable attorney's fees in accordance with the mortgage document and current law together with interest.

/s/ Rebecca A. Solarz, Esq.

---

Rebecca A. Solarz, Esquire  
KML Law Group, P.C.  
701 Market Street, Suite 5000  
Philadelphia, PA 19106-1532  
Phone: (215) 627-1322 Fax: (215) 627-7734  
Attorneys for Movant/Applicant